

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
VICTORIA DIVISION**

STATE OF TEXAS, *et al.*,  
*Plaintiffs,*

vs.

UNITED STATES DEPARTMENT OF  
HOMELAND SECURITY, *et al.*,

INTERVENORS,

*Defendants.*

§ CIVIL ACTION NO.  
§ 6:23-CV-00007  
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§ JUDGE DREW S. TIPTON  
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**INTERVENOR DEFENDANTS' UNOPPOSED MOTION  
TO EXCEED WORD LIMIT IN RESPONSE TO PLAINTIFF STATES'  
MOTION FOR PRELIMINARY INJUNCTION**

Intervenor Defendants in the above-captioned action respectfully request that the Court extend the 5,000-word limit governing their response in opposition to Plaintiff States' Motion for Preliminary Injunction, ECF 22 ("Motion"), to a limit of 7,500 words. The issues implicated in Plaintiff States' Motion are complex, requiring even Plaintiff States to exceed the ordinary word count limit by nearly 1,500 words. ECF 22 at 29. Since Plaintiff States filed that Motion, the Court has consolidated the Motion with a final merits trial, this case has grown to incorporate Intervenor Defendants who seek to introduce their own arguments, experts, and other witnesses, and the parties have produced discovery. All of these developments have significantly increased the complexity of this case. Thus, Intervenor Defendants require additional words in order to meaningfully account for these developments, including by

addressing critical evidence that will aid the Court in its resolution of the issues in this case.

Accordingly, good cause exists to grant Intervenor Defendants' request to extend the word count limitation on their response to Plaintiffs' Motion; granting the request will not delay proceedings or prejudice any party; and granting the request is in the interest of justice. Neither Plaintiff States nor Federal Defendants oppose this request.

Dated: June 13, 2023

Respectfully submitted,

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**CERTIFICATE OF CONFERENCE**

I certify that on June 9 and 12, 2023, counsel for Intervenor Defendants conferred via email with counsel for Plaintiff States and Federal Defendants regarding this Motion and they are not opposed.

/s/ Kate Shih  
Kate Shih

**CERTIFICATE OF SERVICE**

I certify that a copy of the foregoing instrument was served via ECF pursuant to the Federal Rules of Civil Procedure on the 13th day of June 2023, upon all counsel of record in this matter.

/s/ Kate Shih  
Kate Shih